## IN THE UNITED STATES BANKRUPTCY COURT NORTHERN DISTRICT OF MISSISSIPPI

IN RE: MICHAEL LEON BROCK

CHAPTER 11

**Debtor** 

**CASE NO. 19-10293-JDW** 

## MOTION FOR EXTENSION OF TIME WITHIN WHICH TO FILE REQUIRED DOCUMENTS

COMES NOW Michael Leon Brock (the "Debtor"), and files this his Motion for Extension of Time Within Which to File Required Documents (the "Motion"), and in support thereof, would respectfully show unto this Honorable Court as follows, to-wit:

- 1. On January 22, 2019, the Debtor herein filed with this Court his Voluntary Petition for bankruptcy under Chapter 11 of the Bankruptcy Code (the "Petition").
- 2. The Debtor is required to file his Statement of Financial Affairs, Summary of Schedules, Schedules A-J, and Chapter 11 Form 122B (the "Required Documents") on or before February 5, 2019. The Debtor and his counsel have diligently attempted to gather the information necessary to complete the Required Documents and file them in a timely manner. However, because of the extent of the information involved, they have not been able to do so.
  - 3. The Debtor, therefore, seeks additional time to file the Required Documents.
- 4. The granting of this additional time will not significantly delay the progress of this matter, and the required documents will be filed before the Meeting of Creditors pursuant to 11 U.S.C. Section 341(a), which has not been scheduled yet, so that the creditors will have sufficient time to examine and review the required documents prior to said Meeting.
- 5. This extension of time is not sought for purposes of delaying this case before this Court, and the granting of the Motion will not prejudice any creditor or grant any unfair advantage to the Debtor.

Case 19-10293-JDW Doc 13 Filed 02/05/19 Entered 02/05/19 18:18:20 Desc Main Document Page 2 of 3

6. The Debtor requests that this Court grant him a fourteen (14) day extension of time within which to file the Required Documents.

WHEREFORE, PREMISES CONSIDERED, Debtor respectfully prays that this Court grant him a fourteen day extension to file the Required Documents.

This, the \_\_\_\_\_ day of February, 2019.

Respectfully submitted,

MICHAEL LEON BROCK

By His Attorneys,

LAW OFFICES OF CRAIG, M. GENO, PLLC

Craig M Geno

## OF COUNSEL:

Craig M. Geno; MSB No. 4793
Jarret P. Nichols; MSB No. 99426
LAW OFFICES OF CRAIG M. GENO, PLLC
587 Highland Colony Parkway
Ridgeland, MS 39157
601-427-0048 - Telephone
601-427-0050 - Facsimile
cmgeno@cmgenolaw.com
jnichols@cmgenolaw.com

## **CERTIFICATE OF SERVICE**

I, Craig M. Geno, do hereby certify that I have caused to be served this date, via electronic filing transmission, a true and correct copy of the above and foregoing to the following:

Sammye S. Tharp, Esq.
Office of the United States Trustee sammye.s.tharp@usdoj.gov

Craig M. Gend